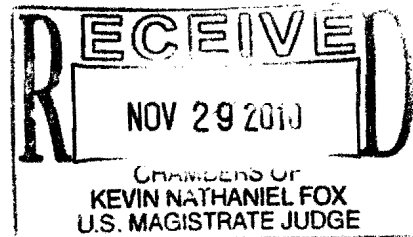


November 26, 2010

BY FAX

Hon. Kevin N. Fox, U.S.M.J.
U.S. District Court, Southern District of New York
500 Pearl Street
New York, NY 10007



Re: Samad Brothers, Inc. v. Bokara Rug Co., Inc., et al.
(S.D.N.Y. Case No. 09 Civ. 5843 (JFK / KNJ))

MEMO ENDORSED

Dear Judge Fox:

We represent plaintiff in the above referenced matter, and submit this letter jointly on behalf of plaintiff and defendants.

Pursuant to Your Honor's order, the scheduling order discovery deadline is November 30, 2010. The parties have worked on completing discovery to meet this deadline. The parties are requesting guidance for handling outstanding discovery that will remain after November 30, 2010.

Specifically, there are three motions pending in this action which may require additional discovery. In addition, the parties stipulate that there are outstanding requests for documents requiring plaintiff's response; additional follow-up requests that plaintiff intends to make following the completion of defendants' depositions on November 30, 2010; and purported deficiencies in defendants' and plaintiff's written responses to discovery. Defendants are in the process of providing additional information and documents to plaintiff.

Thus, the parties will require further discussions regarding the outstanding discovery after November 30, 2010 pending the completion of depositions and the decisions on the three motions. The parties request guidance as to whether Your Honor will agree to hear discovery issues after November 30, 2010 or if we need to raise the outstanding discovery in the upcoming conference before Judge Keenan on December 8, 2010.

Given the present deposition and motion schedules, plaintiff requests that it have until Friday, December 3, 2010, to respond to defendants' letter dated November 24, 2010 to the Court (served during a deposition in this case). Defendants reserve their rights to seek further resolution of such matters if defendants find deficiencies in the responses. Defendants consent to the same. Thank you for your assistance in this matter.

11/30/10

Respectfully submitted,

[Signature]

Mark S. Kaufman

Jura Zibas, Esq.

[Signature]
KEVIN NATHANIEL FOX, U.S.M.J.

The only discovery disputes outstanding, of which the Court is aware, are those outlined in the defendants' November 24, 2010 letter. As to the disclosures sought in that letter, the defendants shall make a formal motion to compel by December 7, 2010. The response shall be filed by December 14, 2010, and any reply shall be filed by December 16, 2010.

cc. (by email): Joanne Romero, Esq. SO ORDERED.